

UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MASSACHUSETTS

OYSTER HARBORS MARINE BUSINESS  
TRUST, as successor in interest to,  
OYSTER HARBORS MARINE, INC.

and

HANOVER INSURANCE COMPANY,  
as subrogee of, RICHARD P. MCCOY,

and

GLENS FALLS INSURANCE COMPANY,  
as subrogee of, ALFRED & HELEN  
CALLAHAN, III

Plaintiffs,

v.

CROSBY YACHT YARD, INC.

Defendant.

CIVIL ACTION NO.  
05 10203 WGY

**PLAINTIFFS' MOTION FOR ADMISSION  
PRO HAC VICE OF DEBORAH A. CRINIGAN, ESQUIRE  
PURSUANT TO LOCAL RULE 83.5.3**

Heather E. Davies, Esquire, of McDonough, Hacking & Lavoie, LLP, attorney for the Plaintiffs, Oyster Harbors Marine Business Trust, Hanover Insurance Company, and Glens Falls Insurance Company, respectfully moves this Honorable Court pursuant to Local Rule 83.5.3 for an order admitting Deborah A. Crinigan, Esquire, *pro hac vice* in this matter and in support thereof states the following:

1. The undersigned is an associate with the law firm of McDonough, Hacking & Lavoie, LLP in Boston, Massachusetts and is a member in good standing, of the Massachusetts state bar.

2. Deborah A. Crinigan, Esquire is an associate with the law firm of White and Williams LLP in Philadelphia, Pennsylvania. She has been a member in good standing of the New Jersey and Pennsylvania state bars since 1994, and the Florida state bar since 1996.

3. In addition, Ms. Crinigan has been admitted to practice before the following federal courts:

- (a) United States District Court for the Eastern District of Pennsylvania;
- (b) United States District Court for the District of New Jersey;
- (c) United States District Court for the Middle District of Pennsylvania;
- (d) United States District Court for the Western District of Pennsylvania;
- (e) United States District Court for the Northern District of Florida;
- (f) United States District Court for the Middle District of Florida;
- (g) United States District Court for the Southern District of Florida;
- (h) United States Court of Appeals for the Third Circuit; and the
- (i) United States Supreme Court.

4. Deborah Crinigan, Esquire has previously been admitted *pro hac vice* in the United States District Court for the District of Delaware, the United States District Court for the District of Washington, D.C., the United States District Court for the Southern District of Alabama and the United States District Court for the District of Maine.

5. Deborah Crinigan, Esquire is not currently, nor has she ever been under any order of disbarment, suspension or any other disciplinary action in any jurisdiction.

6. Deborah Crinigan, Esquire, has read and is familiar with the Local Rules of the United States District Court for the District of Massachusetts.

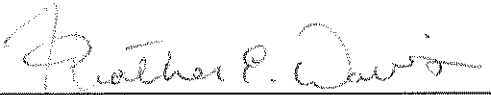
7. In further support of this Motion, Plaintiffs rely on Ms. Crinigan's representation to this Court that she intends to abide by and has read the Federal Rules of Civil Procedure and the Local Rules of this Honorable Court; and that she will cooperate to the fullest extent with local counsel to ensure that her participation in this matter will in no way hinder or delay its

prosecution. Ms. Crinigan's Affidavit in Support of this Motion for Admission *pro hac vice* is attached hereto as Exhibit "A."

8. It is further requested that your Movant's presence at all subsequent proceedings be waived.

WHEREFORE, Plaintiffs, Oyster Harbors Marine Business Trust as successor in interest to, Oyster Harbors Marine, Inc., Hanover Insurance Company, as subrogee of, Richard P. McCoy, and Glens Falls Insurance Company, as subrogee of, Alfred and Helen Callahan, III, respectfully request that this Honorable Court enter an Order in the form attached permitting Deborah A. Crinigan, Esquire to appear *pro hac vice* in the above captioned matter.

**MCDONOUGH, HACKING & LAVOIE, LLP**

By: 

Heather E. Davies, Esquire  
6 Beacon Street, Suite 815  
Boston, MA 02108  
Telephone (617) 367-0808  
Facsimile (617) 367-8307

Attorney for Plaintiffs, Oyster  
Harbor Marine Business Trust,  
Hanover Insurance Company, and  
Glens Falls Insurance Company

Dated: 3/10/05

UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MASSACHUSETTS

OYSTER HARBORS MARINE BUSINESS	:	
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OYSTER HARBORS MARINE, INC.	:	
and	:	
HANOVER INSURANCE COMPANY,	:	
as subrogee of, RICHARD P. MCCOY,	:	
and	:	
GLENS FALLS INSURANCE COMPANY,	:	
as subrogee of, ALFRED & HELEN	:	CIVIL ACTION NO.
CALLAHAN, III	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
CROSBY YACHT YARD, INC.	:	
	:	
Defendant.	:	

**AFFIDAVIT OF DEBORAH A. CRINIGAN, ESQUIRE**  
**IN SUPPORT OF MOTION TO APPEAR PRO HAC VICE**

In support of the foregoing Motion to Appear *Pro Hac Vice*, I, Deborah A. Crinigan on my oath depose and say the following:

1. I am an associate with the law firm of White and Williams LLP, 1800 One Liberty Place, Philadelphia, Pennsylvania 19103 and have been retained to represent Plaintiffs, Oyster Harbor Marine Business Trust, Hanover Insurance Company, and Glens Falls Insurance Company.

2. I have been certified to practice law continuously since 1994 in the Commonwealth of Pennsylvania and the State of New Jersey, and since 1996 in the State of Florida. I am presently a member in good standing of the bar of these three jurisdictions.

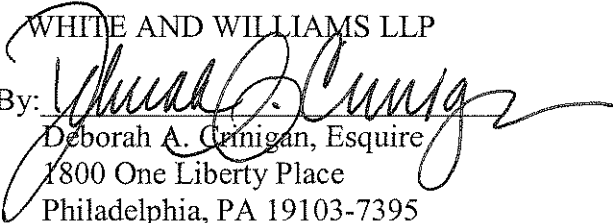
3. I have also been admitted to practice in the following federal courts:

9. I have read and intend to abide by the Federal Rules of Civil Procedure and the Local Rules of this Honorable Court.

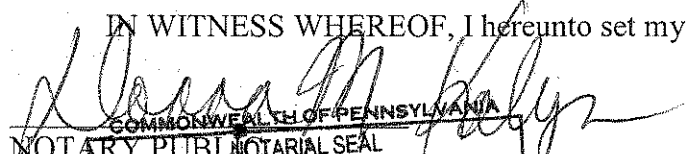
10. I will cooperate to the fullest extent with local counsel, Heather E. Davies, Esquire to ensure that my participation in this matter will in no way hinder or delay its prosecution.

11. I will abide by all requests of this Court and will submit to the disciplinary power of this Honorable Court.

12. As there is no issue of law pertaining to this application, and as a member in good standing of all the state and federal courts referenced above, it is respectfully requested that I, Deborah A. Crinigan, Esquire be admitted *pro hac vice* to appear on behalf of the Plaintiffs, Oyster Harbors Marine, Inc., Hanover Insurance Company, and Glenn Falls Ins. Company in this civil action.

WHITE AND WILLIAMS LLP  
By:   
Deborah A. Crinigan, Esquire  
1800 One Liberty Place  
Philadelphia, PA 19103-7395  
(215)864-7194

Dated: 2/25/05

IN WITNESS WHEREOF, I hereunto set my hand and official seal.  
  
COMMONWEALTH OF PENNSYLVANIA  
NOTARY PUBLIC NOTARIAL SEAL  
DONNA M. KOBRYN, Notary Public  
City of Philadelphia, Phila. County  
My Commission Expires November 15, 2008

2/25/05

UNITED STATES DISTRICT COURT FOR THE  
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and	:	
GLENS FALLS INSURANCE COMPANY,	:	CIVIL ACTION NO.
as subrogee of, ALFRED & HELEN	:	
CALLAHAN, III	:	05 10203 WGY
Plaintiffs,	:	
	:	
v.	:	
	:	
CROSBY YACHT YARD, INC.	:	
	:	
Defendant.	:	

**ORDER**

AND NOW to wit, this \_\_\_\_\_ day of \_\_\_\_\_, 2005, upon consideration of the foregoing Motion for the Admission *Pro Hac Vice* of Deborah A. Crinigan, Esquire to the bar of this Court and any response thereto, it is hereby ORDERED and DECREED that the motion is hereby GRANTED.

IT IS FURTHER ORDERED that Deborah A. Crinigan, Esquire is admitted to appear *pro hac vice* at all proceedings on behalf of the plaintiffs in the above captioned matter and that the presence of Heather E. Davies, Esquire, at all subsequent proceedings is hereby excused and waived.

**BY THE COURT:**

\_\_\_\_\_  
J.

UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MASSACHUSETTS

OYSTER HARBORS MARINE BUSINESS	:	
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GLENS FALLS INSURANCE COMPANY,	:	
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CALLAHAN, III	:	
Plaintiffs,	:	
v.	:	
CROSBY YACHT YARD, INC.	:	
Defendant.	:	

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing Motion for the Admission *pro hac vice* of Deborah A. Crinigan, Esquire was served, on the <sup>10<sup>th</sup></sup> day of <sup>Mar</sup> March 2005 upon the following via first class mail:

Seth S. Holbrook, Esq.  
Holbrook & Murphy  
150 Federal St., 12th Fl.  
Boston, MA 02110

Respectfully submitted,

**MCDONOUGH, HACKING & LAVOIE, LLP**

By: Heather E. Davies  
Heather E. Davies, Esquire  
6 Beacon Street, Suite 815  
Boston, MA 02108  
Telephone (617) 367-0808  
Facsimile (617) 367-8307

Attorney for Plaintiffs, Oyster  
Harbor Marine Business Trust,  
Hanover Insurance Company, and  
Glens Falls Insurance Company

Dated: 3/10/05